

JAP:DCW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-365

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UNITED STATES OF AMERICA

-against-

MERTIS PEARSON,

Defendant.

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

(18 U.S.C. § 513(a))

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EASTERN DISTRICT OF NEW YORK, SS:

BRIAN PARKHILL, being duly sworn, deposes and states that he is a Special Agent with United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 7, 2011, within the Eastern District of New York and elsewhere, the defendant MERTIS PEARSON made, uttered, and possessed forged securities of an organization, with intent to deceive another person and organization.

(Title 18 United States Code Section 513(a))

The source of your deponent's information and the grounds for his belief are as follows¹:

^{1/} Because the purpose of this affidavit is merely to set forth probable cause to arrest, I have not indicated all of the facts and circumstances of which I am aware.

1. On or about April 5, 2011, a package consisting of a soft plastic orange, white and black TNT shipping bag arrived at the United States Postal Service mail facility at John F. Kennedy International Airport ("JFK") in Queens, New York from Cotonou, Benin. The sender of the package was Joseph Ebenezer from Cotonou, Benin. The package listed the destination address as MERTIS PEARSON, 1868 Schenectady Avenue, Brooklyn, New York 11234.

2. United States Customs and Border Protection ("CBP") officers opened and inspected the contents of the package pursuant to a routine customs examination. CBP officers found bundles of approximately 404 bank checks, with a total face value of approximately \$1,367,530.51. Thereafter, bank officials of the banks listed on the checks confirmed that the bank checks contained in the package were not on record with the bank and were counterfeit.

3. On or about April 7, 2011, the Honorable Andrew L. Carter, Jr. issued a warrant authorizing a search of the recipient's address, 1868 Schenectady Avenue, Brooklyn, New York 11234 (the "Search Warrant").

4. Also on or about April 7, 2011, HSI agents arranged a controlled delivery of the package to the recipient's address. Before the delivery, a trip wire device was placed inside the package.

5. At approximately 3:21 p.m. on April 7, 2011, an HSI Special Agent, acting in an undercover capacity as a delivery person, delivered the package to the recipient's address. When the agent knocked on the door, a woman later identified as MERTIS PEARSON came to the door. The defendant accepted delivery of the package by signing for the package in the name of "Mertis Pearson." PEARSON then took the package back inside the residence.

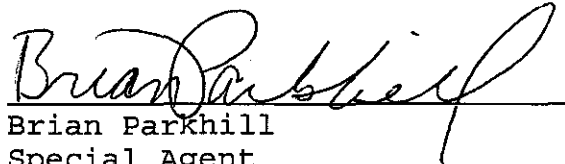
6. Approximately two minutes later, the trip wire device that had been inserted in the package sent a signal to indicate that the package had been opened. HSI agents then executed the search warrant by entering through the front door of the residence. At the time the search commenced, the defendant MERTIS PEARSON was the only adult individual in the residence. Agents located the package that PEARSON had accepted for delivery and found that the package had in fact been opened. The counterfeit bank checks were still inside the package.

7. HSI agents conducted a search of the residence pursuant to the search warrant. During this search, HSI agents found "Versa" software and a "VERSA" printer which are capable of printing bank checks. In the printer feeder was paper with green borders similar to bank checks. The checks were otherwise blank. HSI special agents also found three notifications from the Fines, Penalties and Forfeiture Branch ("FP&F") of CBP that

were addressed to the defendant. In those notifications, which were dated between June 28, 2010 and October 22, 2010, FP&F informed the defendant that it had previously seized multiple counterfeit bank checks and money orders addressed to PEARSON at 1868 Schenectady Avenue, Brooklyn, New York 11234.

8. After being advised of, and waiving, her Miranda rights, the defendant stated in sum and substance that she was being paid to accept the checks and send them to another location. She acknowledged that she suspected that the checks were counterfeit based on the notifications that she had received from FP&F. As a result, the defendant had recently instructed the people who were providing her with the counterfeit checks to send them to her sister's residence in North Carolina in order to escape further detection by CBP.

WHEREFORE, your deponent respectfully requests that a complaint be issued for the defendant MERTIS PEARSON so that she may be dealt with according to law.



Brian Parkhill
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
8th day of April, 2011

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